

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING)	
PHARMACY, INC. PRODUCTS LIABILITY)	
LITIGATION)	
_____)	MDL No. 2419
)	Dkt. No. 1:13-md-2419 (RWZ)
THIS DOCUMENT RELATES TO:)	
)	
All Actions Naming Saint Thomas Hospital and)	
Saint Thomas Outpatient Neurosurgical Center)	

[PROPOSED] AGREED ORDER REGARDING DEADLINES
RELATING TO CONFIDENTIAL SETTLEMENT
WITH NASHVILLE HEALTHCARE DEFENDANTS

It appears to the court based upon the undersigned signatures, that the parties have agreed to the following:

1. By no later than September 9, 2016, the Plaintiffs' Steering Committee ("PSC") and the Nashville Healthcare Defendants¹ shall (1) agree upon the language of a Master Settlement Agreement and execute the Master Settlement Agreement and (2) agree upon the language of the individual release and settlement agreement to be distributed to individual plaintiffs' counsel so that plaintiffs' counsel can then proceed with obtaining individual plaintiffs' signatures on the individual releases and settlement agreements.

It is so ORDERED.

DATE

RYA W. ZOBEL
UNITED STATES DISTRICT JUDGE

¹ "Nashville Healthcare Defendants" includes Defendants Saint Thomas West Hospital f/k/a St. Thomas Hospital, Saint Thomas Health, and Saint Thomas Network (collectively, the "Saint Thomas Entities"); Saint Thomas Outpatient Neurosurgical Center, LLC ("STOPNC"); Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN (collectively, the "STOPNC Defendants").

Approved for entry:

Dated: August 25, 2016

/s/ William D. Leader

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On behalf of the Plaintiffs Steering Committee

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